

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
Statesville Division

CROWN EQUIPMENT CORPORATION,)	
)	
Plaintiff,)	
)	
v.)	Case No. 5:23-cv-00059-KDB-DCK
)	
DAVID BRADY, <i>et al.</i> ,)	
)	
Defendants.)	

**MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF’S FIRST SET
OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

Defendants, David Brady (“Brady”), William Tucker (“Tucker”), Brawtus Holding Company, Inc. (“Brawtus Holding”), Brawtus Management Company, LLC (“Brawtus Management”), and Pneu-Mech Dissolution LLC, formerly known as Pneu-Mech Systems Manufacturing LLC (“the LLC”), pursuant to Rule 6(b) and Rule 26 of the Federal Rules of Civil Procedure, and Local Rule 7.1, hereby submit this motion requesting an extension of time to respond to Plaintiff’s First Set of Interrogatories and Requests for Production of Documents.

In support of this motion, these Defendants state as follows:

1. On or around August 01, 2024, Plaintiff served the above-referenced discovery on Defendants.
2. The deadline to respond to the discovery is August 31, 2024.
3. Undersigned counsel requires addition time to respond to the discovery.
4. The undersigned has conferred with Plaintiff’s counsel and the same has consented to an extension of time to respond through and including October 03, 2024.
5. This Motion is not being made to cause unnecessary delay.

WHEREFORE, Brady, Tucker, the Brawtus Companies, and Pneu-Mech, LLC respectfully request that this Court grant an extension of time to respond to the above-referenced discovery through and including **October 03, 2024**.

Dated: August 19, 2024.

BY COUNSEL

/John B. Riordan/

John Riordan (NC. Bar No. 54973)
FIDELITY LAW GROUP
8511 Davis Lake Pkwy, C6-138,
Charlotte, NC, 28269
Phone: 704-285-8111
j.riordan@theflg.com

Abbi White Harris, Esq. (NC Bar No. 59883)

Andrew P. Connors, Esq. (Va. Bar. No. 80248)
(Admitted *Pro Hac Vice*)
DARKHORSE LAW PLLC
7331 Timberlake Rd., Suite 201A
Lynchburg, VA 24502
Phone: 540-553-8149 ext. 2
Fax: 540-301-6460
abbi@darkhorse.law
andrew@darkhorse.law
Lead Counsel

*Counsel for Defendants David Brady, William
Tucker, Brawtus Holding Co., Inc., Brawtus
Management Co., LLC, and Pneu-Mech Dissolution
LLC*

CERTIFICATE OF SERVICE

I hereby certify that on August 19, 2024, I electronically filed the foregoing, along with a proposed order on the same, with the Clerk of the Court by using the CM/ECF system, which served the foregoing on the following counsel of record who are CM/ECF participants:

Toby K. Henderson &
Joanna W. Gisel
Sebaly Shillito & Dyer
1900 Kettering Tower
40 North Main Street
Dayton, OH 45423-1900
P: 937-222-2500
F: 937-222-6554
thenderson@ssdlaw.com
jgisel@ssdlaw.com
Counsel for Plaintiff

Cory Bradley Patterson
Nelson Mullins Riley & Scarborough LLP
301 South College Street, 23rd Floor
Charlotte, NC 28202
704-417-3154
Fax: 704-377-4814
Email: cory.patterson@nelsonmullins.com
Counsel for Plaintiff

Clifton Andrew Alexander Dandison &
Kayla Nicole McDaniel
Cranfill Sumner LLP
5535 Currituck Dr., Suite 210
Wilmington, NC 28403
910-777-6075
Fax: 910-777-6157
Email: adandison@cshlaw.com
Kmcddaniel@cshlaw.com
Counsel for Defendant Boggs

Ryan Lee Bostic
Stott, Hollowell, Palmer & Windham
401 E. Franklin Blvd.
P.O. Box 995
Gastonia, NC 28053
704-864-3425
Email: rbostic@cshlaw.com
Counsel for Defendant Boggs

Gerald Anderson Stein, II
Hedrick Gardner Kincheloe & Garofalo
4201 Congress St., Suite 300
28209
Charlotte, NC 28209
704-319-5464
Email: astein@hedrickgardner.com
*Counsel for Defendant Pneu-Mech Systems
Manufacturing, Inc.*

Bo Brandon Caudill
Villmer Caudill, PLLC
P.O. Box 18186
Charlotte, NC 28218
704-216-8255
Fax: 704-216-8555
Email: bocaudill@villmercaudill.com
Counsel for United Finishing Systems LLC

Elizabeth Venum
Hull & Chandler
1009 East Boulevard
Charlotte, NC 28203
lvennum@lawyercarolina.com

*Attorney for Third-Party Defendants Jerry W.
Trostle and James R. Andrews*

/John B. Riordan/

John Riordan (NC. Bar No. 54973)

FIDELITY LAW GROUP

8511 Davis Lake Pkwy, C6-138,

Charlotte, NC, 28269

Phone: 704-285-8111

j.riordan@theflg.com

*Counsel for Defendants Brady,
Tucker, Brawtus Holding, Inc.,
Brawtus Management LLC, and Pneu-
Mech Dissolution LLC*

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ORDER

THIS CAUSE coming before the undersigned Clerk on the Motion of Defendants David Brady (“Brady”), William Tucker (“Tucker”), Brawtus Holding Company, Inc. (“Brawtus Holding”), Brawtus Management Company, LLC (“Brawtus Management”), and Pneu-Mech Dissolution LLC, formerly known as Pneu-Mech Systems Manufacturing LLC (“the LLC”) for an Order extending the time in which to serve responses to Plaintiff’s First Set of Interrogatories and Requests for Production of Documents;

AND IT APPEARING that the initial time period allotted to Defendants to respond to the same has not yet expired;

IT IS THEREFORE ORDERED that the time within which Defendant may serve responses to Plaintiff’s First Set of Interrogatories and Requests for Production of Documents is hereby extended up to and including October 03, 2024.

Dated: _____

CLERK